

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : CHAPTER 13

Gwendolyn & Leon Parker :
DEBTOR : BKY. NO. 17-15382ELF13
Gwendolyn & Leon Parker :
Plaintiff :
vs. : ADV. NO.
Greentree Servicing, LLC :
Defendant :

COMPLAINT TO DETERMINE SECURED STATUS

1. Debtors own their residence known as 60 Houston Road, Lansdowne, PA with a fair market value of \$73,787. **Exhibit A.**
2. Debtor has a first mortgage with Rushmore with a balance of approximately \$143,000.
3. The second mortgage debt in favor of Defendant is wholly unsecured pursuant to 11 USC 506 and In Re: McDonald

WHEREFORE, Debtors' pray that this Honorable court enter an order finding the mortgage debt to Defendant as wholly unsecured.

Respectfully submitted,

Date: **August 8, 2017**

BY: /s/ Michael A. Cataldo
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